

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANTHONY RAY RIVERA,

Plaintiff,

vs.

JOSHUA HOBSON,

Defendant.

NO. 5:16-cv-05003-MAK

PLAINTIFF'S PROPOSED JURY VERDICT FORM

1. Was the Defendant, Joshua Hobson, negligent in the operation of his motor vehicle?

If you answer "Yes" to the above, go to Question No. 2.

If you answer "No", your deliberations are complete, Plaintiff cannot recover. Please return to the courtroom.

2. At the time of Joshua Hobson's negligence, did the Plaintiff, Anthony Rivera, have reasonable cause to know he was being pursued by police?

If you answer "No" to the above, go to Question No. 3.

If you answer "Yes", your deliberations are complete, Plaintiff cannot recover. Please return to the courtroom.

3. Was the Defendant, Joshua Hobson's, negligence the factual cause of Plaintiff's harm?

If you answer "Yes" to the above, go to Question No. 4.

If you answer "No" to all Defendants, your deliberations are complete, Plaintiffs cannot recover. Please return to the courtroom.

4. Was the Defendant, Joshua Hobson's, conduct malicious, wanton, willful, oppressive, or shows reckless indifference to the interests of others?

5. Was the Plaintiff, Anthony Rivera, contributorily negligent?

If you answer "Yes", go to Question No. 6.

If you answer "No", go to Question No. 7.

6. What percentage of that causal negligence was attributable to the Defendant and what percentage was attributable to the Plaintiff?

Percentage of causal negligence attributable to Defendant, Joshua Hobson:

_____ %

Percentage of causal negligence attributable to Plaintiff, Anthony Rivera, (Answer only if you answered "Yes" to Question Nos. 5).

_____ %

TOTAL 100%

7. Itemize the amount of damages, if any, sustained by Plaintiff, Anthony Rivera, as a result of this accident without regard to and without reduction by the percentage of causal negligence, if any, that you have attributed to the Plaintiff, Anthony Rivera.

- (a) Past and present pain and suffering,
Embarrassment, humiliation, and
loss of enjoyment of life

\$ _____

- (b) Future pain and suffering, embarrassment,
humiliation, and loss of enjoyment of life

\$ _____

- (c) Past medical expenses

\$ _____

- (d) Past lost earnings and lost earning capacity

\$ _____

- (e) Future lost earnings and lost earning capacity

\$ _____

(f) Future medical expenses \$ _____

(g) Punitive Damages \$ _____
(Only if you answered "yes" to question No. 4).

Total \$ _____

CERTIFICATE OF SERVICE

The undersigned certifies that on November 30, 2018, a true and correct copy of the foregoing Proposed Jury Instructions was filed electronically upon the following parties:

David J. MacMain, Esq.
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Counsel for Defendant

This Certificate of Service and the said filing are intended to be available for viewing and downloading from the ECF system of the United States District Court for the Eastern District of Pennsylvania.

By: /s/ Travis J. Savoia
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Date: 11/30/2018